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AttorneysforDefendant  
WELLSFARGOFINANCIAL  
ACCEPTANCEMISSOURI,INC.

UNITEDSTATESDISTRICTCOURT  
NORTHERNDISTRICTOFCALIFORNIA

RICHARDHOWARD,

Plaintiff,

vs.

WELLSFARGOFINANCIAL  
ACCEPTANCE,WELLSFARGOAUTO  
FINANCE,INC.,WELLSFARGO  
FINANCIALCAR,LLC,andDOES1-50,

Defendants.

CaseNo.:CO7-05881EDL

**WELLSFARGO'SINITIAL  
DISCLOSURES(FED.R.CIV.P.26(A))**

ComplaintDate:November20,2007

PursuanttoRule26(a)(1)oftheFederalRulesofC ivilProcedure,WellsFargoFinancial  
AcceptanceMissouri,Incorporated(“WellsFargo”), suederroneouslyasWellsFargoFinancial  
Acceptance,WellsFargoAutoFinance,Inc.andWell sFargoFinancialCAR,LLC,hereby  
makesthefollowinginitialdisclosures.WellsFar gohasnotcompleteditsinvestigationintothis  
matteranddiscoveryhasnotbeencompleted.Thef ollowingdisclosuresarebasedonthe  
informationpresentlyavailabletoWellsFargobase donitscurrentunderstandingofPlaintiff’s  
claims.WellsFargoreservestherighttosuppleme ntormodifythesedisclosuresandtouseany  
additionalinformation,witnesses,orevidenceata nytime,uptoandincludingtrial,asPlaintiff

1 elaborates on his allegations or identifies witnesses, new information is discovered, or new  
2 defenses or theories are developed.

3 **A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION.**

4 Wells Fargo identifies the following individuals likely to have discoverable information  
5 that it may use to support its claims or defenses and the subjects of information:

- 6 1. Plaintiff, Richard Howard
- 7 2. Alyson Clement, Operations Manager for Credit Dispute Resolution, at 711 W  
8 Broadway Road, Tempe, Arizona 85282, (480) 858-8874, all issues regarding the disputed  
9 account.

10 **B. DOCUMENTS IN WELLS FARGO'S POSSESSION, CUSTODY, OR**  
11 **CONTROL THAT MAY BE USED TO SUPPORT WELLS FARGO'S**  
**CLAIMS AND DEFENSES.**

12 Wells Fargo identifies its files relating to account number \*\*\*\*7593. Wells Fargo also  
13 possesses other documents which establish that Mr. Howard's name has been removed from this  
14 account and will prevent future reporting.

15 **C. COMPUTATION OF DAMAGES.**

16 Wells Fargo makes no claim for damages in this action.

17 **D. APPLICABLE INSURANCE AGREEMENT.**

18 Wells Fargo is not aware of any insurance policy that may satisfy any part of any  
19 judgment which may be entered in this action.

20  
21  
22 DATED: February 19, 2008

SEVERSON & WERSON  
A Professional Corporation

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24  
25 By: /s/Peter H. Bales  
Peter H. Bales

26 Attorneys for Defendant  
27 WELLS FARGO FINANCIAL ACCEPTANCE  
MISSOURI, INC.  
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